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DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

January 24, 2017

Lee Collins, Director
San Luis Obispo County Social
Services Department
3433 South Higuera
P.O. Box 8119
San Luis Obispo, CA 93403

Dear Mr. Collins:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of September 26 to September 30, 2016. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Jaime Urquizo at (916) 654-2101. You may also contact him by e-mail at james.urquizo@dss.ca.gov

Sincerely,

Original signed by Jim Tashima

JAMES TASHIMA, Chief
Civil Rights Unit
Welfare to Work Division

Enclosure

C: Kevin Lucado, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
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Andrew Riesenbergs
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Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN LUIS OBISPO COUNTY SOCIAL
SERVICES DEPARTMENT
Conducted on
September 26, 2016 to September 30, 2016**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Jaime Urquizo

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Luis Obispo with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 19 to September 23, 2016. An exit interview was held on September 23, 2016, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Higuera	3422 S. Higuera St, San Luis Obispo, CA	Calfresh, Calworks, CWS	English, Spanish
State Hearings	3563 Empleo, San Luis Obispo, CA	State Hearings Office only	English, Spanish
Aroyo	1086 Grand Ave, Aroyo Grande, CA	Calfresh, Calworks, CWS, IHSS	English, Spanish
Atascadero	9415 El Camino Real, Atascadero, CA	Calfresh, Calworks, CWS, IHSS	English, Spanish
Nipomo	681 W Teft , Nipomo, CA	Calfresh, Calworks, CWS	English, Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Input from community advocate groups.

In this review the following organization(s) were contacted for feedback.

- Pathpoint
775 W. Grant Ave # C
San Luis Obispo, CA
- Children's Resource and Referral
611 E. Main St, # 103
San Luis Obispo, CA

- NOTE: These organizations did not have any observations.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Children Social Workers	10	9
Receptionist/Screeners	8	7
Calfresh / Calworks Workers	18	16
Total	36	32

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

Languages of clients' cases (English, Spanish)	In Home Support Services	Children Services	Calfresh	CalWorks	TOTAL
English speakers' case files reviewed	3	4	4	5	16
Non-English or limited-English speakers' case files reviewed	17	33	33	35	118

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval. Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	yes			
Does the county have extended hours to accommodate clients?	yes			
Can applicants access services when they cannot go to the office?	yes			Online Services available and call centers
Does the county ensure the awareness of available services for individuals in remote areas?	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	yes			
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	yes			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	yes			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	yes			
Were the current versions of the required posters present in the lobbies?	yes			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	yes			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	yes			

B. Corrective Actions

None

C. Recommendations

None

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: Monday – September 26, 2016 - 3422 S Higuera St, San Luis Obispo

Parking	All Disabled parking lot lines are in need of repainting.	The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a
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		<p>minimum 36" wide x 36" high.</p> <p>(CA T24 11B-502.6.4.1) pg. 169</p> <p>The parking space shall be marked with an International Symbol of Accessibility ...in white or a suitable contrasting color</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p> <p>The centerline of the International Symbol of Accessibility shall be a max. of 6" from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p>
<p>Parking – Is there additional signage or additional language below the symbol of accessibility “Minimum Fine \$250”?</p>	<p>Four (4) parking signs missing additional signage - "Minimum Fine \$250"</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250”. (CA T24 11B-502.6.2) pg. 169</p>
<p>Parking - Is there unauthorized parking signage at entrance to off-street accessible parking?</p>	<p>Two (2) Unauthorized parking signage at entrance to off street</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site</p>

	accessible parking missing.	<p>accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
Parking Directional signage to accessible entrance if not main entrance?	Directional signage needed at ends of building guiding clients to disabled parking close to the entry way to the building.	Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the

		accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28
Signage	Three (3) No smoking signs at front of building not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Signage	Two (2) Building signs in front San Luis Obispo ... and hours of operation not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p>

		(CA T24 11B-703.5) (ADA 703.5) pg. 379
Signage - Front Entrance to Building - Accessible signage?	ISA Disabled sign not available at front entry to the building	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28</p> <p>Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28</p> <p>Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>

Client Interview Rooms & Booths - Disable signage, is the signage compliant?	No Disabled Interview room signage designated. (13 interview rooms available)	Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379
Men's Bathroom - Pipes under sink securely insulated?	Men's Bathroom - Three (3) pipes under sink not securely insulated. (1st floor)	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
Women's Bathroom - Pipes under sink securely insulated?	Women's Bathroom - Three (3) pipes under sink not securely insulated. (1st floor)	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
Men's Bathroom - Pipes under sink securely insulated?	Men's Bathroom - One (1) pipe under sink not securely insulated. (2nd floor)	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lava-

		tories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
Women's Bathroom - Pipes under sink securely insulated?	Women's Bathroom - One (1) pipe under sink not securely insulated. (2nd floor) One (1) loose wrapping	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lava- tories and sinks. (CA T24 11B- 606.5) (ADA 606.5) pg. 330
Client Interview Rooms & Booths - Disable signage, is the signage compliant? Signage to be 40" max	2nd Floor - two interview rooms - no disabled room designated	Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379 All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212) Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379

<p>Client Interview Rooms & Booths - Disable signage, is the signage compliant? Signage to be 40" max</p>	<p>2nd Floor - two visit rooms - no disabled room designated</p>	<p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p> <p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
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1a. Facility Location: 3563 Empleo St, San Luis Obispo

Administration building – Reviewed 10 Vendor Contracts / Visited Call Center

<p>Client Interview Rooms & Booths - Disable signage, is the signage compliant? Signage to be 40" max</p>	<p>Three (3) Conference Rooms - no disabled room designated with signs.</p>	<p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p> <p>All instructional and directional</p>
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		<p>signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
<p>Client Interview Rooms & Booths - Disable signage, is the signage compliant? Signage to be 40" max</p>	<p>Three (3) Visit Rooms - no disabled room designated with signs.</p>	<p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p> <p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p>

		(CA T24 11B-703.5) (ADA 703.5) pg. 379
Client Interview Rooms & Booths - Disable signage, is the signage compliant? Signage to be 40" max	One (1) Hearing Rooms - no disabled room designated with signs.	<p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p> <p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>

2. Facility Location: TUESDAY – September 27, 2016 – 681 West Teft, Nipomo, CA

Directional & Informational Signage - Available in threshold languages?	Directional Sign needed at entrance to parking area guiding clients to office entrance.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate
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		languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)
Parking – Is there additional signage or additional language below the symbol of accessibility “Minimum Fine \$250”?	Van Accessible Sign missing additional signage language below symbol of accessibility "Minimum Fine \$250"	Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250” . (CA T24 11B-502.6.2) pg. 169 Signs identifying van parking spaces shall contain additional language or an additional sign with the designation “Van Accessible.” (CA T24 11B-502.6) (ADA 502.6) pg. 169

3. Facility Location: Wednesday – September 28, 2016 – 9415 El Camino Real, Atascadero, CA

Facility Element	Findings	Corrective Action
Parking - Is there unauthorized parking signage at entrance to off-street accessible parking?	Two (2) Unauthorized parking signs at entrance to off street accessible parking missing correct language.	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170 The additional sign shall not be less than 17” wide x 22” high. Fig. 4 (CA T24 11B-502.8.1) pg. 170

		<p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
<p>Parking – Is there additional signage or additional language below the symbol of accessibility "Minimum Fine \$250"?</p>	<p>Van Accessible Sign missing additional signage language below symbol of accessibility "Minimum Fine \$250"</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2) pg. 169</p> <p>Signs identifying van parking spaces shall contain additional language or an additional sign with the designation "Van Accessible." (CA T24 11B-502.6) (ADA 502.6) pg. 169</p>

**4. Facility Location: Thursday – September 29, 2016 – 1086 Grand Ave,
Aroyo Grande, CA**

<p>Parking - Is there unauthorized parking signage at entrance to off-street accessible parking?</p>	<p>One (1) Sign at entry to parking lot - missing information tow company name.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
<p>Parking – Disabled Parking lines</p>	<p>All disabled parking lines need to be repainted.</p>	<p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in</p>

		<p>white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) pg. 176</p> <p>The area within the blue borderlines shall be marked with hatched lines a max. of 36" on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) pg. 176</p>
Parking - Is there additional signage or additional language below the symbol of accessibility "Minimum Fine \$250"?	Two (2) disabled parking signs (on the right side of the building entry and Two (2) disabled parking signs (on the left side of the building entry - missing additional signage language below symbol of accessibility "Minimum Fine \$250"	Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250" . (CA T24 11B-502.6.2) pg. 169
Parking - Sign height? 60" min height if NOT on accessible route. 80" min when on accessible route.	One (1) disabled Parking sign on the right side of the building entry is posted too low to the ground at 11"	Signs shall be 60" min. above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6) (ADA 502.6) pg. 169

Signage - Directional signage to accessible entrance if not main entrance?	Directional sign needed at the the corner of the front disabled parking area - guiding clients to the front entrance.	Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28
Parking - Sign height? 60" min height if NOT on accessible route. 80" min when on accessible route.	Back lot disabled parking signs too low at 46"	Signs shall be 60" min. above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6) (ADA 502.6) pg. 169
Directional & Informational Signage - Available in threshold languages?	No Smoking sign at front entrance not at threshold language	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)
Women's Bathroom - Pipes under sink securely insulated?	Women's Bathroom - Two (2) pipes under sink not securely insulated	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330

		There shall be no sharp or abrasive surfaces under laboratories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
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V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	yes			
Does the county use a	yes			

Question	Yes	No	Some-times	Comments
primary language form?				
Does the client self-declare on this form?	yes			
Are non-English- or limited- English-speaking clients provided bilingual services?	yes			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	yes			
Is there a delay in providing services?		no		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	yes			
Are county interpreters determined to be competent?	yes			
Does the county have adequate interpreter services?	yes			
Does the county allow minors to be interpreters? If so, under what circumstances?		no		The County has policy in place to NOT allow minors to function as interpreters. Under certain circumstances they do allow and it is clearly documented in the case file. Basic interpretation is allowed, not case related.

Question	Yes	No	Some-times	Comments
Does the county allow the client to provide his or her own interpreter?	yes			The County will allow and documentation is evident.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	yes			
Does the county use the CDSS-translated forms in the clients' primary languages?	yes			
Is the information that is to be inserted into NOA translated into the client's primary language?	yes			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	yes			
Does the county identify a client with a disability (physical, mental, or learning)?	yes			
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	yes			

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	yes			
Does the county offer screening for learning disabilities?	yes			
Is there an established process for offering screening?	yes			
Is the client identified as having a learning disability referred for evaluation?	yes			

B. Corrective Actions

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	In Home Support Services	Children Services	Calworks	Calfresh
Ethnic origin documentation	San Luis Obispo (SLO) county is clearly identifying client ethnicity on	San Luis Obispo (SLO) county is clearly identifying client ethnicity on	San Luis Obispo (SLO) county is clearly identifying client	San Luis Obispo (SLO) county is clearly identifying client

	records.	records.	ethnicity on records.	ethnicity on records.
Primary Language documentation	SLO is clearly identifying a client's primary language as intake and documenting it well.	SLO is clearly identifying a client's primary language as intake and documenting it well.	SLO is clearly identifying a client's primary language as intake and documenting it well.	SLO is clearly identifying a client's primary language as intake and documenting it well.
Method of providing bilingual services & documentation	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.
Client provided own interpreter	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.
Method to inform client of potential problem using own interpreter.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.	A client is advised on the usage of his or her own interpreter and the possible shortcomings by doing this. It is documented.
Individual's acceptance or refusal of written material offered in their primary language.	When a client refuses written material offered in their language it is documented.	When a client refuses written material offered in their language it is documented.	When a client refuses written material offered in their language it is documented.	When a client refuses written material offered in their language it is documented.

Documentation of circumstances for using a minor interpreter temporarily	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.
Method of identifying a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.

B. Corrective Actions
None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	yes			
Do employees understand				

the county policy regarding a client's rights and procedure to file a discrimination complaint?	yes			
Does the county provide employees Cultural Awareness Training?	yes			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	yes			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	yes			

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference				

Interview and review areas	Yes	No	Some-times	Findings
between a program, discrimination, and a personnel complaint?	yes			
Did the employees know who the Civil Rights Coordinator is?	yes			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	yes			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	yes			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	yes			

B. Corrective Action:

None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

No observations were submitted by the contacted community organizations.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Luis Obispo County Social Services Department Civil Rights Compliance Plan for the period October 1, 2016 – September 30, 2017, was received on September 1, 2016. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the San Luis Obispo County Social Services Department staff warm, welcoming, informative and very supportive. Thanks to Kevin Lucado, Civil Rights Coordinator for organizing the details of the review. Each District Office, staff was helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the San Luis Obispo County Social Services Department is in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The San Luis Obispo County Social Services Department must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.